UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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ATLANTA, GEORGIA 30303-8960

June 30, 2015

Mr. Mark Lewis
Superintendent
Biscayne National Park
9700 SW 328'h Street
Homestead, FL 33033

RE: **Biscayne National Park Supplemental Final General Management Plan / Environmental Impact Statement**
CEQ Number: 20150156

Dear Mr. Lewis:

Pursuant to National Environmental Policy Act (NEPA) Section 102(2)(C) and the Clean Air Act (CAA) Section 309, the U.S. Environmental Protection Agency (EPA) has reviewed the referenced Biscayne National Park Final General Management Plan/ Environmental Impact Statement (FEIS). General management plans are intended to be long-term documents that establish and articulate a management philosophy and framework for decision making and problem solving in units of the national park system. General management plans usually provide guidance during a 15- to 20-year period.

Background

The 2011 Draft GMP/EIS was released to the public in August 2011 and reflected agency and stakeholder engagement throughout the entire GMP process. The National Park Service (NPS) conducted public scoping meetings and workshops (in 2001, 2003, and 2009) and held three public meetings on the Draft GMP/EIS in 2011. During the public comment period in 2011, more than 18,000 public comments were received and more than 300 people attended public meetings. A key component of the agency-preferred alternative in the 2011 Draft GMP/EIS was inclusion of a marine reserve zone. Most comments were related to fishing, and in particular, the marine reserve zone. The marine reserve zone was proposed as an area in the park where fishing of any kind would be prohibited to allow a portion of the coral reef system to recover and offer visitors a high-quality visitor experience associated with a healthy, intact coral reef system.

During the August 2011 public comment period, a number of substantive comments

were received that identified both positive and negative impacts related to the establishment of the marine reserve zone. In particular, individuals who fish, fishing and marine industry organizations, and the Florida Fish and Wildlife Conservation Commission with whom the NPS consults regarding fishing management actions in the park, raised a number of significant issues about the NPS preferred alternative, including the marine reserve zone. The position of the State of Florida was that any consideration of a marine reserve zone could only occur after measurable management objectives have been clearly defined and less restrictive management measures have been appropriately implemented and evaluated in close coordination with agencies and stakeholders.

Based on the comments received, the NPS undertook an evaluative process to consider a number of management actions that could be deployed to achieve the goal of a healthier coral reef ecosystem within the zone to provide a more enjoyable and diverse visitor experience, while protecting the park's natural and cultural resources.

Alternatives

Planning team members gathered information about existing visitor use and the condition of park facilities and resources. They considered which areas of the park attract visitors and which areas have sensitive resources.

Using the above information, the planning team developed a set of 11 management zones and 8 alternatives to reflect the range of ideas proposed during scoping sessions. These management zones and alternatives are composed of alternatives 2 through 5 originally presented in the 2011 Draft Plan, alternatives 6 and 7 that were presented in the 2013 Supplemental Plan. Alternative 8 presented in this FEIS is the NPS preferred alternative and a hybrid of alternatives 4 and 6.

The full range of alternatives was developed from a number of different perspectives. This included comments received on the alternatives newsletter and during public scoping meetings and workshops, public and agency comments received on the 2011 Draft Plan, 2013 Supplemental Plan, and 2014 public workshops, cost estimates, analysis of potential impacts. With these and other elements in mind, the NPS drafted the preferred alternative (alternative 8—the final NPS preferred alternative—a hybrid of alternatives 4 and 6), which balances resource protection, visitor experience, and interagency collaboration. Alternative 8 replaces the former agency preferred alternative 4 from the 2011 Draft Plan and alternative 6 from the 2013 Supplemental Plan.

EPA Comments

Compliance with Section 106 of the National Historic Preservation Act (NHPA) should be documented as the project progresses. The EPA defers to the State Historic Preservation Officer (SHPO) and Tribes regarding these issues. The EPA encourages NPS consultation with the Seminole Tribe of Florida and the Miccosukee Tribe of Indians of Florida at all levels of decision-making. In addition, EPA also recommends that the project team continue coordination with the local community and Tribes to address concerns that may arise as the project progresses.

The FEIS provides an adequate discussion of Turkey Point and the Comprehensive Everglades Restoration Plan (CERP) in the cumulative impacts section.

Green Building

In the spirit of collaboration and technical assistance, the EPA recommends some sustainability concepts which might be considered in the implementation of the final management plan.

Green building is the practice of creating structures and using processes that are environmentally responsible and resource-efficient throughout a building's life-cycle from design to, construction, operation, maintenance, renovation and deconstruction. This practice expands and complements the classical building design concerns of economy, utility, durability, and comfort. Green building is also known as a sustainable or high performance building.

Green buildings are designed to reduce the overall impact of the built environment on human health and the natural environment by:

- Efficiently using energy, water, and other resources
- Protecting occupant health and improving employee productivity
- Reducing waste, pollution and environmental degradation

For example, green buildings may incorporate sustainable materials in their construction (e.g., reused, recycled-content, or made from renewable resources); create healthy indoor environments with minimal pollutants (e.g., reduced product emissions); and/or feature landscaping that reduces water usage (e.g., by using native plants that survive without extra watering).

In the United States, buildings account for:

- 39 percent of total energy use
- 12 percent of the total water consumption
- 68 percent of total electricity consumption
- 38 percent of the carbon dioxide emissions

Potential benefits of green building can include:

Environmental benefits

Enhance and protect biodiversity and ecosystems
Improve air and water quality
Reduce waste streams
Conserve and restore natural resources

Economic benefits

Reduce operating costs

Create, expand, and shape markets for green product and services
Improve occupant productivity
Optimize life-cycle economic performance

Social benefits

Enhance occupant comfort and health
Heighten aesthetic qualities
Minimize strain on local infrastructure

Green Parking

Green parking refers to several techniques that when applied together reduce the contribution of parking lots to total impervious cover. From a storm water perspective, green parking techniques applied in the right combination can dramatically reduce impervious cover and, consequently, reduce the amount of storm water runoff. Green parking lot techniques include: setting minimums of permanent parking spaces; minimizing the dimensions of parking lot spaces; utilizing alternative pavers in overflow parking areas; using bioretention areas to treat storm water; and encouraging shared parking.

Green parking lots can dramatically reduce the creation of new impervious cover. How much is reduced depends on the combination of techniques used to achieve the greenest parking. While the pollutant removal rates of bioretention areas have not been directly measured, their capability is considered comparable to a dry swale, which removes 91 percent of total suspended solids, 67 percent of total phosphorous, 92 percent of total nitrogen, and 80-90 percent of metals (Claytor and Schueler, 1996).

North Carolina's Fort Bragg vehicle maintenance facility parking lot is an excellent example of the benefits of rethinking parking lot design (NRDC, 1999). The redesign incorporated storm water management features, such as detention basins located within grassed islands, and an onsite drainage system that exploited existing sandy soils. The redesign reduced impervious cover by 40 percent, increased parking by 20 percent, and saved 20 percent or $1.6 million on construction costs over the original, conventional design.

Briefly three other sustainable activities which may applicable to the NPS's general management plan are as follows:

- **Green Detention Ponds**
- **Rain Water Harvesting**
- **Rain Gardens**

EPA requests that these sustainable activities also be considered by the NPS during the final design and implementation phase of the general management plan.

Thank you for the opportunity to review this FEIS. Based on EPA's review of the FEIS, EPA agrees with the NPS that Alternative 8, with consideration of additional Best Management Practices, would be the most balanced and environmentally-sound approach. Please contact Ken Clark of my staff at (404) 562- 8282, if you have any questions or wish to discuss our comments further.

Sincerely,

for

Heinz J. Mueller, Chief
NEPA Program Office
Resource Conservation and Restoration Division